



Rebecca Monck Ricigliano  
(212) 895-4268  
RRicigliano@crowell.com

June 1, 2021

**VIA ELECTRONIC MAIL AND ECF**

The Honorable Vernon S. Broderick  
United States District Judge  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007


Re: *United States v. Cameron Collins*, S1 18 Cr. 567 (VSB)

Dear Judge Broderick:

As the Court is aware, we represent Cameron Collins in the above-captioned case. On January 23, 2020, the Court sentenced Cameron to a five-year term of probation with special conditions including six months of home confinement and 500 hours of community service following his October 2019 guilty plea to one count of conspiring to commit securities fraud. After Cameron pled guilty, but prior to sentencing, Cameron also settled the parallel civil enforcement action filed by the Securities and Exchange Commission ("SEC") and disgorged all of his avoid losses (plus interest). For the reasons set forth in more detail below, we respectfully request that the Court grant early termination of Cameron's probation pursuant to Title 18, United States Code, Section 3564(c). While we are aware that the Government and Probation Department are opposed to this request, we believe that due to Cameron's continued compliance and good behavior, he should be granted early termination of his probation sentence.

1. Procedural Background

At Cameron's sentencing, after consideration of both the advisory Sentencing Guidelines range and the factors set forth in Title 18, United States Code, Section 3553(a), the Court varied from the advisory Guidelines range (37-46 months' imprisonment) and imposed a sentence which included a five-year term of probation, six months of home confinement and 500 hours of community service, suggesting that such community service involve assistance to the poor, homeless, or others in need. In addition, the Court ordered payment of a \$150,000 fine and

**APPLICATION DENIED,  
SO ORDERED**   
**VERNON S. BRODERICK**  
**U.S.D.J. 6/21/2021**

Defense counsel, the Government, and the Probation Department are directed to meet and confer concerning modification of the two week advance notice for travel, including, but not limited to, whether the advance notice can either generally be reduced or whether it can be reduced for emergency family matters.

imposed the standard, mandatory conditions of probation. *See* January 23, 2020 Sentencing Transcript at 76-77.

In fashioning the sentence, the Court observed that an incarceratory sentence for Cameron was “not appropriate,” and varied downward based on the “unique facts and circumstances” present in this case. *Id.* at 78. While the Court recognized the seriousness of the offense to which Cameron pled guilty, its impact on the public’s confidence in the financial markets, and the aggravating effect of his false statements to the FBI, the Court, acknowledging that, in this case, the sins of the father should not be visited upon the son, also noted the “positive contributions” Cameron made to society throughout the course of his young life, characterizing them as “altruistic acts.” *Id.* at 66-67, 73-74, 76. In doing so, the Court recognized the “conscious choice” Cameron repeatedly made over the course of his life to engage in the volunteering and acts of kindness described in his sentencing submission and the letters annexed thereto. *Id.* at 74; *see also* Docket Entry 152, Sentencing Memorandum Filed on Behalf of Cameron Collins.

Cameron reported to the Probation Department in the Southern District of New York the day after his sentencing, which then transferred supervision to the Middle District of Florida, where he resides with his now-wife, Lauren. Cameron also paid the fine imposed in full on January 24. The probation term and home confinement period commenced on February 4, 2020. The six-month home confinement period ended without incident on August 5, 2020. Cameron continues to comply with all conditions of his probation.

Despite the declaration of a national emergency in March 2020 caused by COVID-19, Cameron performed over 500 hours of community service between February 2020 and June 2020 at three locations approved by his Probation Officer, including:

- [REDACTED] **Collier County, Florida.** Cameron’s 48 hours of community service with [REDACTED] involved assistance with framing, painting, siding, and carpentry for multiple homes constructed in a 45-home planned community. The community included homes built for families who otherwise could not afford one. Many of the family members assisted with the construction of the homes in the community, working side-by-side with Cameron on occasion.
- [REDACTED] **Collier County, Florida.** The [REDACTED] is a [REDACTED]. The facility is located [REDACTED]

██████████. Cameron's 417.5 hours of community service at the ██████████ included:

- Assisting with set up of tents, generators, and equipment for the ██████ drive-through food bank, which provided families in need with one week of groceries during the pandemic;
  - Extensive painting inside and outside of the facility buildings;
  - Serving as a front-door greeter after the facility reopened following the initial COVID-19 shutdown;
  - Landscaping and maintenance work, including digging and resurfacing the tennis court, mulching, and movement of rock to a dumpster;
  - Reinstalling computer and telephone service in the main building and overall assistance with a building construction project; and
  - Establishing internet service in the facility's maintenance shop for the first time (at Mr. Collins's own expense).
- ██████████ **Collier County, Florida.** ██████████ is an education and experience center which provides sanctuary, care, and rehabilitation to ██████████. It also educates ██████████. Cameron's 45 hours of community service at ██████████ involved cleaning of various animal enclosures, animal care, construction repairs, landscaping, and fencing installation and repairs.

Since completing home confinement, Cameron's supervision by Probation consists of completing a monthly report and submitting it to the Probation Department via an electronic portal. However, he is also required to seek permission to travel outside of the Middle District of Florida (the district of supervision) two weeks in advance of travel.

## 2. Legal Standard and Reasons for Early Termination Request

Title 18, United States Code, Section 3564(c) provides for early termination of probation, and states, in relevant part, that the Court

after considering the factors set forth in section 3553(a) to the extent they are applicable, may, pursuant to the provisions of the Federal Rules of Criminal Procedure relating to the modification of probation, terminate a term of probation previously ordered and discharge the defendant . . . after the expiration of one year of probation in the case of a felony, if it is satisfied that such action is warranted by the conduct of the defendant and the interests of justice.

Title 18, Section 3564(c); *see also* Fed. R. Crim. Pro. 32.1(c). Courts grant early termination “‘occasionally,’ and in light of ‘changed circumstances,’ including ‘exceptionally good behavior.’” *See United States v. King*, 07 Cr. 1143 (DC), 2012 WL 1382436, \*2 (S.D.N.Y. April 20, 2012) (citing *United States v. Lussier*, 104 F.3d 32, 36 (2d Cir. 1997)); *see also United States v. Dwyer*, 15 Cr. 385 (AJN), 2019 WL 3242308, \*2 (S.D.N.Y. July 3, 2019). While “new or changed circumstances are not a prerequisite to early termination” of probation, without more, “full compliance with the terms of probation” does not “generally . . . warrant” early termination. *United States v. Dwyer*, 2019 WL 3242308 at \*2. “Exceptional” compliance can be considered by a court in determining whether to grant early termination. *See United States v. King*, 2012 WL 1382486 at \*2.

There are several reasons why the Court should grant early termination of probation for Cameron. *First*, Cameron engaged in exceptionally good behavior for the past approximately one year and four months while on probation, serving as a model probationer. Unsurprisingly, Cameron’s probation has been without incident. In addition, for over a year and a half after his voluntary surrender on August 8, 2018, Cameron abided by the terms of his pre-trial release and conditions. Therefore, for over two and a half years, Cameron lived under some form of supervision and remained compliant with all conditions, at all times. *See id.* (granting early termination of probation based in part on full compliance with conditions of probation and crediting the full compliance with pre-trial supervision for a year and eight months prior to the sentence of probation).

*Second*, in addition to his full compliance with the terms of his probation, Cameron completed (and exceeded) all 500 community service hours imposed by the Court *within the first six months* of his probation term during a pandemic. *See* Exhibit A (volunteer hour timesheets). This is exceptional performance and adherence to the probation terms, and even more noteworthy given that the volunteer hours occurred during the initial wave of lockdowns and restrictions prompted by the pandemic. *See, e.g., United States v. Dwyer*, 2019 WL 3242308 at \*2 (acknowledging the “substantial steps” taken by the defendant, including obtaining licenses, to reintegrate into the community and turn his life in a positive direction as evidence of “‘exceptionally good behavior’” that may warrant a reduction in the term of probation).



Moreover, and true to his nature, Cameron earned the admiration of those with whom he volunteered during his many hours of service. For example, upon completion of his service at the [REDACTED], Cameron received a card from the [REDACTED] employees to say goodbye and wish him well in his future endeavors. *See* Exhibit B (goodbye card from [REDACTED] employees). One signer recognized Cameron and his efforts at the [REDACTED] by noting: “you are the best thing that happened to the [REDACTED].” *Id.* In addition to these farewell wishes, Cameron received a letter of recommendation from his supervisor at the [REDACTED], who described Cameron as “dependable” and “energetic,” noting that Cameron completed a “wide variety of tasks with care, skill, and unfailing good humor.” *See* Exhibit C. One of the tasks included establishing internet service in the [REDACTED] maintenance shop for the first time at Cameron’s own expense, above and beyond any condition of his probation. *Id.*

*Third*, Cameron continues to assist his wife, Lauren, with the care of [REDACTED] and [REDACTED]. Although [REDACTED] reside near [REDACTED], due to [REDACTED], it is important for Cameron and Lauren to travel to New Jersey whenever needed to assist [REDACTED] and the [REDACTED]. Seeking permission to travel two weeks in advance from the Probation Department as required hinders their ability to do so. For example, Cameron and Lauren [REDACTED] and were able to [REDACTED] for [REDACTED] in February. Under normal circumstances, Cameron and Lauren would have traveled to New Jersey to accompany [REDACTED] to [REDACTED] and remain with [REDACTED] following [REDACTED], but they were unable to do so because Cameron could not give the required two weeks’ notice to Probation prior to traveling. [REDACTED] accompanied [REDACTED], but were required to cancel [REDACTED] and rearrange their own schedules to do so.

In addition, [REDACTED] has two ongoing issues that require attention. Cameron and Lauren purchased [REDACTED], but the [REDACTED], which involves bringing the [REDACTED]. While the [REDACTED] requires additional care. Cameron and Lauren would like to be able to provide this assistance and care to [REDACTED] whenever needed, but Cameron is hampered by the two-week notice requirement. In addition, [REDACTED] struggles with technology, and Cameron and Lauren often spend hours on the phone with [REDACTED] to talk through technology issues. The ability to be there more in person and on short notice would allow Cameron (and Lauren) to attend to [REDACTED] much more quickly and result in less frustration for [REDACTED].

Most recently, in mid-April 2021, [REDACTED]. Following [REDACTED] entered a

[REDACTED]. Cameron worked with his probation officer and received permission to travel to New Jersey to assist [REDACTED]. Following [REDACTED]. This will likely include at least [REDACTED]. Cameron and Lauren [REDACTED]. They also want to provide additional care and support to [REDACTED]. All of this necessitates flexibility on Cameron's part that may not be possible given the two-week notice travel requirement.

Also, [REDACTED] Cameron and Lauren assist more with [REDACTED]. This remains especially true with respect to Cameron's relationship [REDACTED]. His support [REDACTED] requires flexibility for Cameron to be able to respond quickly when an issue arises. For example, [REDACTED]. If Cameron had the ability to travel on short notice, he would have [REDACTED].

*Fourth*, pursuing a long-held desire to start their own business, in October 2020, Cameron and Lauren formed a [REDACTED] and purchased an income-generating rental property. They have worked hard while on Probation-approved trips to ready the property for rentals, and secured over [REDACTED] with an associated [REDACTED] of reservations for 2021 thus far. The property receives excellent reviews due to their hard work and attention to detail. However, Cameron's ability to travel on short notice in the event of an emergency at the property or to oversee or attend to a repair is important. Compliance with Probation's two-week notice requirement prior to travel will not be possible in those scenarios. For example, on March 3, a long-term rental guest contacted Cameron and informed him that the internet service failed at the property, only two days after the guest had checked in. Cameron configured the internet at the home, and therefore neither the local internet provider nor maintenance could assist. Fortunately, Cameron was already on a pre-approved trip in that District and personally attended to the problem, but would not have been able to do so in the ordinary course due to the requirement that he provide Probation with two weeks' notice prior to any out-of-District travel.

As Cameron and Lauren grow their real estate business for their future, his ability to travel to see a property for sale and attend to the upkeep of their properties on short notice is also

important. The real estate market remains active, and his inability to travel quickly may result in a lost opportunity for Cameron to grow the business with Lauren. As with the [REDACTED] summarized above, such business-related responsibilities will require travel on short notice, often well less than the two-week notice requirement for seeking permission to travel from the Probation Department permits. While important, to be sure, [REDACTED] and business-related travel often will not qualify as emergency situations justifying urgent requests to Probation for travel permission. Nor does Cameron wish to repeatedly pepper his Probation Officer with non-emergency travel requests to afford him the ability to care for [REDACTED] and business. Therefore, his ability to contribute meaningfully to the care of [REDACTED], and to nurture the nascent business he is building with Lauren is impeded.

*Finally*, granting early termination of probation in this unique case does not somehow excuse the crime to which Cameron pled guilty and for which he was sentenced. He has completed every other aspect of his sentencing. Cameron will continue to have a felony conviction and learned a painful lesson from his conduct in his case. He will forever carry the attendant SEC sanctions. But as his time on probation continues to demonstrate, the events over the course of a few days in late June 2017 when Cameron was 24 years old do not define him. He has lived and continues to live a life of service, kind acts, and assistance to others. For all of the above reasons, early termination of Probation is appropriate here.

\* \* \* \*

Cameron does not make this request to the Court lightly, and fully appreciates the significant variance he received at sentencing. However, in light of his outstanding compliance with the terms of probation imposed, under the difficult circumstances of the COVID-19 pandemic, his desire to continue assisting whenever necessary [REDACTED], and the attention required to his growing real estate business, Cameron Collins respectfully requests that the Court grant early termination of his probation.

We are available at the Court's convenience should Your Honor have any questions about this application.

The Honorable Vernon S. Broderick  
June 1, 2021  
Page 8

Respectfully submitted,

A handwritten signature in blue ink, reading "Rebecca M. Ricigliano". The signature is fluid and cursive, with a long horizontal stroke at the end.

Rebecca Monck Ricigliano  
Thomas A. Hanusik

cc: AUSA Scott Hartman (*by email*)  
AUSA Damian Williams (*by email*)  
Probation Officer Shamika Whitlock (*by email*)



## EXHIBIT A

### Volunteer Hour Timesheets



View or print your history.

Enter a date range and click "Update" to generate your volunteer history during the selected date range.

View volunteer history and hours from

1/27/2020

To

5/27/2020

UPDATE

TOTAL HOURS

48.0 hours

Carpentry - Tuesday, February 11	4.0 hours
Carpentry - Thursday, February 13	4.0 hours
Painting - Tuesday, February 18	4.0 hours
Siding - Thursday, February 20	4.0 hours
Carpentry, miscellaneous, finish work - Tuesday, February 25	4.0 hours
Painting - Thursday, February 27	4.0 hours
Painting - Tuesday, March 3	4.0 hours
Framing - Thursday, March 5	4.0 hours
Siding - Tuesday, March 10	4.0 hours
Framing - Thursday, March 12	4.0 hours
Siding - Tuesday, March 17	4.0 hours
Framing - Tuesday, March 17	4.0 hours

# VOLUNTEER TIME SHEET

FGCU: ☐

Court: ☐

#Hours: \_\_\_\_\_

PLEASE PRINT CLEARLY

Name: Cameron Collins

Phone: \_\_\_\_\_

DATE	START	END	TOTAL	JOB PERFORMED	AUTHORIZATION
02/08/20	12	1	1	orientation	
02/14/20	8	12	4	Landscape, Car Park	
02/21/20	8	12	4	crash car, Park, dig new enclosure	
02/22/20	8	12	4	fencing, construction	
02/28/20	8	12	4	clean racoons, Jasper, Melbourne meet some animals	
2/29/20	8	12	4	landscape, lower run with Kent work on enclosure	
3/6/20	8	12	4	clean yuk: and before, Run on JC 10	
3/7/20	8	12	4	clean creek min mimok willow Jasper Fill bottles	
3/13/20	8	12	4	tortoises, creek min, mimok willow Jasper, fixed Gate & mimok door	
3/14/20	8	12	4	tortoises, creek min, mimok willow Jasper, Bogie & Kiya	
3/20/20	8	12	4	tortoises, mimok willow, Melbourne margen, Kent's drain	
3/21/20	8	12	4	tortoises, creek min, Kiya Bogie Boyle enclosure	

Thank You for choosing \_\_\_\_\_ and helping us care for the animals !!!

To confirm this information please call, fax, eMail or write to:

\_\_\_\_\_



## COMMUNITY SERVICE WORK PROGRAM

### Time Verification Form

***\*Defendants performing community work at below average or poor levels should be referred back to the Community Supervision Officer and the CSR Coordinator immediately. Work performed at these levels will not be acceptable.***

DEFENDANT'S NAME: Cameron Collins PHONE: [REDACTED]  
 RECIPIENT AGENCY: [REDACTED] TYPE: [REDACTED]  
 AGENCY CONTACT PERSON [REDACTED] PHONE: [REDACTED]  
 WORK SITE SUPERVISOR: [REDACTED]  
 OBLIGATIONS: Monthly Requirement  
 PROBATION OFFICER'S NAME: [REDACTED] [REDACTED]

Date	Time In	Time Out	Hours Worked	Work Performance Notes	Verification (Site Supervisor)
2/13/20	12:45	5:45	5	MAINT.	
2/17/20	9:30	5:30	8	Paint building	
2/18/20	12:30	5:30	5	MAINT.	
2/20/20	12:30	5:30	5	" "	
2/24/20	9:30	5:30	8	Clean courts and courts	
2/25/20	12:30	5:30	5	<del>MAINT.</del> MULCH	
2/27/20	12:30	5:30	5	MAINT.	
3/2/20	9:30	5:30	8	Clay, mow, bleach paint	
3/3/20	12:30	5:30	5	Playground Paint MAINT.	
3/5/20	12:30	5:30	5	Playground MAINT. Setup	
3/9/20	9:30	5:30	8	Courts, paint sweep, bag MAINT	
3/10/20	12:30	5:30	5	Paint clean MAINT. fms	
3/12/20	12:30	5:30	5	Paint, fms	
3/16/20	9:30	5:30	8	Courts, Pickleball court fix Vert	
3/17/20	12:30	5:30	5	MAINT.	
3/19/20	12:30	5:30	5	MAINT.	
3/20/20	12:30	5:30	5	MAINT.	

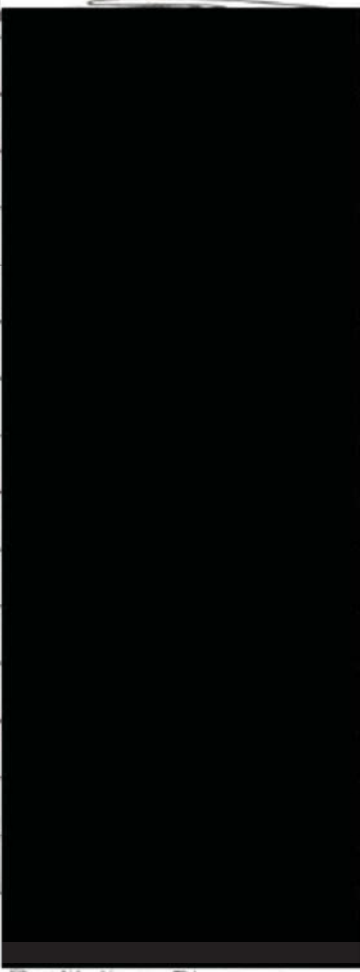
NOTE: This is a CSCD issued form to document court ordered Community Service Restitution. Please ensure that verified time-in/time-out and hours worked are accurate. All credit is on an hour for hour basis.



**COMMUNITY SERVICE WORK PROGRAM  
Time Verification Form**

**\*Defendants performing community work at below average or poor levels should be referred back to the Community Supervision Officer and the CSR Coordinator immediately. Work performed at these levels will not be acceptable.**

DEFENDANT'S NAME: Cameron Collins PHONE: [REDACTED]  
 RECIPIENT AGENCY: \_\_\_\_\_ TYPE: \_\_\_\_\_  
 AGENCY CONTACT PERSON \_\_\_\_\_ PHONE: \_\_\_\_\_  
 WORK SITE SUPERVISOR: \_\_\_\_\_  
 OBLIGATIONS: \_\_\_\_\_ Monthly Requirement \_\_\_\_\_  
 PROBATION OFFICER'S NAME: [REDACTED] [REDACTED]

Date	Time In	Time Out	Hours Worked	Work Performance Notes	Verification (Site Supervisor)
<del>3/23/20</del>	<del>12:45</del>	<del>5:45</del>	<del>5</del>	<del>Maint</del>	
3/23/20	9:30	5:30	8	Paint Gym maint	
3/24	9:00	5:30	8.5	Paint Gym	
3/26	9:00	5:30	8.5	Paint Gym	
3/30	9:30	5:30	8	Paint Gym	
3/31	9:30	5:30	8	"	
4/2	8:30	4:30	8	Painting	
4/6/20	9:30	5:30	8	Paint, maintenance, clean	
4/7/20	8:30	4:30	8	Maint. Gym/Gym	
4/9/20	8:30	4:30	8	" Repair Door	
4/13/20	9:00	5:30	8.5	Repair Door, Paint maint	
4/14/20	8:30	4:30	8	Paint main. Doors	
4/16/20	8:30	4:30	8	Maint.	
4/20/20	9:30	5:30	8	Paint Gym Hallway	
4/21/20	8:30	4:30	8	Paint, maint	
4/23/20	8:30	4:30	8	Repaired doors	

NOTE: This is a CSCD issued form to document court ordered Community Service Restitution. Please ensure that verified time-in/time-out and hours worked are accurate. All credit is on an hour for hour basis.

**COMMUNITY SERVICE WORK PROGRAM**  
**Time Verification Form**

**\*Defendants performing community work at below average or poor levels should be referred back to the Community Supervision Officer and the CSR Coordinator immediately. Work performed at these levels will not be acceptable.**

DEFENDANT'S NAME: Cameron Collins PHONE: [REDACTED]  
 RECIPIENT AGENCY: \_\_\_\_\_ TYPE: \_\_\_\_\_  
 AGENCY CONTACT PERSON \_\_\_\_\_ PHONE: \_\_\_\_\_  
 WORK SITE SUPERVISOR: \_\_\_\_\_  
 OBLIGATIONS: \_\_\_\_\_ Monthly Requirement \_\_\_\_\_  
 PROBATION OFFICER'S NAME: [REDACTED] [REDACTED]

Date	Time In	Time Out	Hours Worked	Work Performance Notes	Verification (Site Supervisor)
4/27/20	9:30	5:30	8	Paint Kelly Room	[REDACTED]
4/28/20	8:30	4:30	8	Paint Kelly + outside	
4/29/20	8:30	4:30	8	Paint Ben	
5/4/20	9:30	5:30	8	Paint Ben	
5/6/20	8:30	4:30	8	Paint Main Hall	
5/7/20	8:30	4:30	8	Paint build/cubby	
5/11/20	9:30	5:30	8	Paint building	
5/12/20	8:30	4:30	8	Paint main door	
5/14/20	8:30	4:30	8	twist up, sign	
5/18/20	8:30	6:00	9.5	Main. Front door	
5/19/20	8:30	6:00	9.5	Main + front door	
5/21/20	8:30	5:30	9	FITNESS	
5/25/20	7:00	3:00	8	Main Front build	
5/26/20	8:30	4:30	8	FITNESS etc	
5/28/20	8:30	4:30	8	FITNESS	
6/1/20	9:30	5:30	8	Paint electric	

**NOTE: This is a CSCD issued form to document court ordered Community Service Resolution. Please ensure that verified time-in/time-out and hours worked are accurate. All credit is on an hour for hour basis.**



**COMMUNITY SERVICE WORK PROGRAM  
Time Verification Form**

**\*Defendants performing community work at below average or poor levels should be referred back to the Community Supervision Officer and the CSR Coordinator immediately. Work performed at these levels will not be acceptable.**

DEFENDANT'S NAME: Cameron Collins PHONE: [REDACTED]  
 RECIPIENT AGENCY: \_\_\_\_\_ TYPE: \_\_\_\_\_  
 AGENCY CONTACT PERSON \_\_\_\_\_ PHONE: \_\_\_\_\_  
 WORK SITE SUPERVISOR: \_\_\_\_\_  
 OBLIGATIONS: \_\_\_\_\_ Monthly Requirement \_\_\_\_\_  
 PROBATION OFFICER'S NAME: [REDACTED] [REDACTED]

Date	Time In	Time Out	Hours Worked	Work Performance Notes	Verification (Site Supervisor)
6/2/20	830	430	8	NEW CREST	[REDACTED]
6/4/20	830	430	8	PAINT ADMIN	
6/8/20	930	530	8	Tennis Courts / Storage	
6/9/20	830	430	8	"	
6/11/20	830	430	8	PAINT, COURT	
6/15/20	930	530	8	Tennis Courts / Storage	
6/16/20	830	430	8	Tennis CTS	
6/18/20	830	430	8	Tennis CTS	

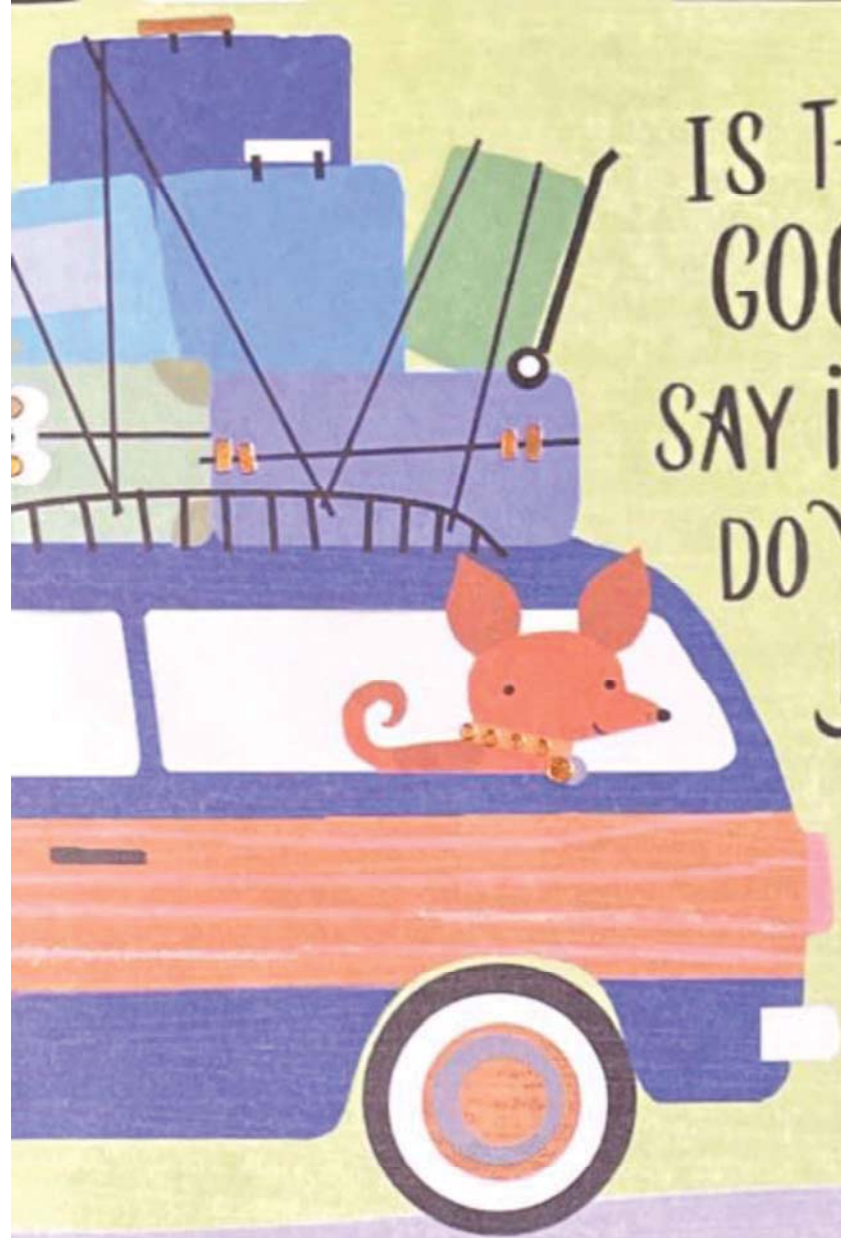
**NOTE:** This is a CSCD issued form to document court ordered Community Service Restitution. Please ensure that verified time-in/time-out and hours worked are accurate. All credit is on an hour for hour basis.

EXHIBIT B

Goodbye Card from [REDACTED] Employees



IS THIS  
GOOD-BYE?  
SAY IT ISN'T SO!  
DO YOU REALLY  
HAVE TO GO?









## EXHIBIT C

### Letter of Recommendation




June 17, 2020

To Whom it may concern:

Cameron Collins has performed service work at the [REDACTED] since mid-February, 2020. His attendance and punctuality have been consistent throughout. We have found him to be a dependable, energetic and a pleasant young man who has performed a wide variety of tasks with care, skill and unfailing good humor. These chores include extensive painting inside the building and exterior, as well as assisting with a reconstruction project in our main building, including reinstallation of a computer and telephone service. He set up an internet service in our maintenance shop where none had been available previously. He did this at his own expense.

In addition to the above he has helped us dig out and resurface clay tennis courts, spread mulch, move a very large mound of heavy rock to a dumpster, and acted as a greeter at our front door when the facility opened after the COVID-19 shutdown.

The staff and membership have found him to be helpful, good mannered and a pleasure to work with. I recommend him to you without any reservation. Please feel free to contact me if more information would be helpful.



Sincerely,

